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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION**

JOHN MARTIN KEARNEY, an Oregon resident; **ROBIN A. BECK**, a Colorado resident; **CARLY LaFOREST**, a Michigan resident; **SHANE ALLPORT**, a Michigan resident; **ALYSIA ROWE**, a Michigan resident; **RICHARD JAMES SCHEMPP**, a California resident; and **JOHN DOE**, a Washington resident on behalf of themselves and all similarly situated persons,

Plaintiffs,

v.

EQUILON ENTERPRISES, LLC, a Delaware corporation dba **SHELL OIL PRODUCTS US**, and **SHELL OIL COMPANY**, a foreign corporation,

Defendants.

Case No. 3:14-cv-00254-HZ

**PLAINTIFFS' MOTION FOR
ENLARGEMENT OF TIME TO FILE
SECOND AMENDED CLASS ACTION
ALLEGATION COMPLAINT**

MOTION

Plaintiffs move this court for an additional 20 days within which to file their Second Amended Complaint as directed by the court in its Opinion and Order dated December 1, 2014. The filing is currently due December 16. If granted, Plaintiffs' Second Amended Complaint would be due on January 5, 2015.

This Motion is supported by the declaration of Rick Klingbeil, filed separately.

Dated: December 10, 2014.

Rick Klingbeil, PC

/s/ Rick Klingbeil

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(*Pro hac vice* applications to be submitted)